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April 18, 2005

Hon. James H. Welsh Commissioner of Conservation Office of Conservation Post Office Box 94275 Baton Rouge, Louisiana 70804-4275

Re:

Rob 7 Sand, Reservoir C-1

Bayou Sale Field

St. Mary Parish, Louisiana

Dear Commissioner Welsh:

Application is hereby made on behalf of **BP AMERICA PRODUCTION COMPANY** for the calling of a public hearing, after legal notice, to consider evidence relative to the issuance of an order pertaining to the following matters relating to the Rob 7 Sand, Reservoir C-1, in the Bayou Sale Field, St. Mary Parish, Louisiana:

- 1. To permit the applicant to drill, designate and utilize its SMPL No. 81 Well as substitute unit well for the ROB 7 RC-1 SUA, said well located approximately as shown on the plat attached hereto, in exception to the spacing provisions of Office of Conservation Order No. 87-H-18, effective June 17, 1975.
- 2. To find that the proposed substitute unit well is necessary to efficiently and economically drain a portion of the reservoir covered by the unit which cannot be so drained by any existing well within such unit.
- 3. To find that a tolerance of no closer than 150 feet from the nearest unit line for the proposed substitute unit well is necessary to account for the possible variance between the proposed location and the "as drilled" location.
- 4. Except to the extent contrary herewith, to continue in full force and effect the provisions of Office of Conservation Order No. 87-H-18, the unit created thereby, and applicable Statewide Orders.

5. To consider such other matters as may be pertinent.

The Rob 7 Sand, Reservoir C-1, in the Bayou Sale Field, St. Mary Parish, Louisiana, was defined in Office of Conservation Order No. 87-H-18, effective June 17, 1975.

The existing unit well, the BP America Production Company – SMPL No. 46 Well, is no longer producing from the ROB 7 RC-1 SUA. It is the applicant's opinion that the proposed substitute unit well is necessary to efficiently and economically drain that portion of the reservoir covered by subject unit and that such drilling, designation and use will be in the interest of conservation and will cause no harm or injury to others.

Attached hereto and made a part hereof is a plat outlining the applicant's proposal, along with a list of the names and addresses of the Interested Owners, Represented Parties and Interested Parties to whom a copy of this application is being sent. Pursuant to the Revised Rules of Procedure, the list of parties is being furnished only to the Commissioner of Conservation and to the District Manager of the Lafayette District of the Office of Conservation; however, the list of parties will be provided to any party requesting a copy of it. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Interested Parties and Represented Parties.

Finally, enclosed is our check on behalf of the applicant, in the amount of \$755.00 made payable to the Office of Conservation and representing the required hearing application fee.

Very truly yours,

RWRjr/dbf Enclosures

Richard W. Revels, Jr.

cc: Mr. Richard Hudson, Lafayette District Office of Conservationcc: Interested Owners, Represented Parties and Interested Parties

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